

EXHIBIT C



From: Edward Chin
To: Wroblewski, Karlee
Cc: Subashi, Darlena; Bo Davis; Christian Hurt; TQDelta Listserv; Nokia309
Subject: Re: TQ Delta v. Nokia - Depositions
Date: Friday, June 10, 2022 2:57:36 PM

Karlee,

TQ Delta requests a meet-and-confer call at 3:30pm Central today. Please let me know if that works, and we'll send out a dial-in.

Ed Chin, Of Counsel
The Davis Firm, P.C.
213 N. Fredonia St., Suite 230
Longview, Texas 75601
office: 903-230-9090
echin@davisfirm.com

On Jun 10, 2022, at 2:32 PM, Wroblewski, Karlee <Karlee.Wroblewski@alston.com> wrote:

Ed,

Each of Nokia's witnesses are available for one 7-hour day.

Best,
Karlee

Karlee N. Wroblewski | Alston & Bird LLP
704.444.1299 office | 715.808.4562 mobile

From: Edward Chin <echin@davisfirm.com>
Sent: Friday, June 10, 2022 1:56 PM
To: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Cc: Subashi, Darlena <Darlena.Subashi@alston.com>; Bo Davis <bdavis@davisfirm.com>; Christian Hurt <churt@davisfirm.com>; TQDelta Listserv <tqd@davisfirm.com>; Nokia309 <Nokia309@alston.com>
Subject: Re: TQ Delta v. Nokia - Depositions

EXTERNAL SENDER – Proceed with caution

Karlee,

We are still considering the comments in your email below, but as to No. 3, please clarify if Nokia is taking the position that it will not present any of the four witnesses for more than one 7-hour day. For example, if we need Mr. Van Bruyssel's 30b6 deposition to extend into a 2nd or 3rd day, would Nokia not allow that?

Also, a 30(b)(6) deposition and 30(b)(1) deposition are separate depositions. If, for example, we need Mr. Van Bruyssel's 30(b)(6) deposition to take two days but need the separately noticed Rule 30(b)(1) deposition to occur on a third day, would Nokia not allow that?

TQ does not intend to ask a witness duplicative questions in the separate 30(b)(6) deposition and 30(b)(1) deposition.

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On Jun 10, 2022, at 12:38 PM, Wroblewski, Karlee <Karlee.Wroblewski@alston.com> wrote:

Ed,

I've responded to each of your points in turn below.

1. These witnesses are based in and being made available in Antwerp, Belgium and are available during normal business hours, local time. TQ Delta elected to take these depositions remotely and from a different time zone. We are willing to accommodate a later start time if TQ Delta wishes, but we will not be presenting a witness past 8pm local time.
2. Nokia is fine with the order TQ Delta proposes below, assuming TQ Delta intends to strictly limit its corporate questioning to the topics indicated. To the extent the nature of the 30(b)(1) and 30(b)(6) topics are duplicative, Nokia will object and not allow such duplicative questioning to continue.
3. Consistent with the FRCP 30, each witness is being made available for "1 day of 7 hours." TQ Delta brought and, despite guidance from the Court in the Court's Focusing Order and prior to the *Markman* hearing, maintains a case with 19 Asserted Patents. To the extent TQ Delta believes more time is required, that is a problem of its own making.
4. In Nokia's April 11, 2022 response to TQ Delta's March 10, 2022 letter, Nokia responded as follows: "This request is objectionable to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, the